

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ZD, a minor by her parent and natural  
Guardian, SHANAE BRIDGEFORD**  
*Plaintiff*

**CHESTER COMMUNITY CHARTER  
SCHOOL**  
*Defendants*

**: No. 2:22-cv-05082**  
**:**   
**: CIVIL ACTION**  
**:**   
**: Electronically filed**  
**:**

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of Plaintiff Shanae Bridgeford's Petition for Leave to Compromise a Minor's Action and Allocate Settlement Funds, it is hereby ORDERED and DECREED that the Petition is GRANTED. Plaintiff Shanae Bridgeford is authorized to enter into a settlement with Chester Community Charter School for a gross sum of [REDACTED]. Defendants shall forward all settlement drafts or checks to Plaintiff's counsel for proper distribution.

It is further ORDERED and DECREED that the funds of the total gross settlement of [REDACTED] shall be allocated as follows:

To: [REDACTED], a Minor : \$ [REDACTED]  
  
DOB: [REDACTED]  
Social Security: [REDACTED]

To: **The Law Office of Jared S. Zafran, LLC:**

Funds reimbursed for litigation expenses [REDACTED]  
Counsel Fees (25% of Settlement) after costs [REDACTED]

**TOTAL:** [REDACTED]

COUNSEL (and not the parents and/or guardians to the Minor) is hereby AUTHORIZED and specifically DIRECTED to execute all documentation necessary to deposit the funds belonging to the Minor, [REDACTED] in an interest-bearing savings certificate in a federally insured bank or savings institution having an office in Philadelphia County IN THE NAME OF THE MINOR ONLY. The certificate shall be marked as hereinafter directed.

The certificate shall be titled and restricted as follows [REDACTED], a Minor, not to be redeemed except for renewal in its entirety, nor to be withdrawn, assigned, negotiated, or otherwise alienated before the Minor attains majority on December 7, 2034, except upon prior Order of Court.

If no withdrawals are made from the investments authorized by this Decree, the depository may pay over the balance on deposit when the Minor attains majority, upon the order of the late Minor, without further Order of this court.

Within thirty (30) days from the date of this Decree, counsel for Petitioner shall file an Affidavit, certifying compliance with this Decree. Counsel shall attach to the Affidavit a copy of the savings certificate reflecting the required restrictions and shall pay such fee as may be required by the Clerk. The Affidavit shall bear the caption of the United States District Court and shall contain the case number.

The Affidavit shall further contain a specific averment by counsel that counsel, and not the parent(s) and/or guardian(s) of the Minor, established the account(s) and deposited the funds therein as directed above.

BY THE COURT:

---

HON. KELLY HODGE

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**ZD, a minor by her parent and natural  
Guardian, SHANAE BRIDGEFORD**  
*Plaintiff*

**CHESTER COMMUNITY CHARTER  
SCHOOL**

*Defendants*

: No. 2:22-cv-05082  
:  
: CIVIL ACTION  
:  
: Electronically filed  
:

Plaintiff Shanae Bridgeford, through her attorney, Andrew J. Thomson, Esquire, hereby moves for this court to order that the Court grant her Petition for Leave to Compromise a Minor's Action and in support thereof avers:

1. Plaintiff Shanae Bridgeford filed a Complaint on December 21, 2022 alleging that her daughter Z.D. was assaulted by a male student in the bathroom on October 5, 2022 after having earlier interactions with the same boy in which he had previously assaulted her in the schoolyard.
2. Plaintiff brought claims under Title IX.
3. Defendant denied all allegations in the Complaint and asserted affirmative defenses in an Answer filed March 3, 2023.
4. The parties litigated the matter and as of October were preparing for trial at that time of settlement discussions on November 2, 2023.
5. On November 2, 2023, Plaintiff Shanae Bridgeford approved the settlement amount of [REDACTED] for Z.D.
6. The proposed distribution of \$[REDACTED] is as follows:

To: [REDACTED], a Minor :

DOB: [REDACTED]  
Social Security: [REDACTED]

To: **The Law Office of Jared S. Zafran, LLC:**

Funds reimbursed for litigation expenses  
Counsel Fees (25% of Settlement) after costs

[REDACTED]

**TOTAL:**

[REDACTED]

7. Z.D. is a minor and the Court must approve any settlement of his action.
8. As part of the agreement to settle the matter, Plaintiff and Defendant have agreed to mutual confidentiality regarding the settlement amount.
9. Z.D. began therapy with Joseph J. Peters Institute in April 2023 and continues to have therapy in accordance with the plan. See, Wellness Plan attached at Exhibit A.
10. Plaintiff and counsel recommend approval of a settlement for Z.D., a minor, in the gross amount of negotiated with the Defendants' counsel, because they believe that it adequately represents a full and complete settlement of the case equal to or greater than that which may be obtained should the matter be fully litigated.
11. Plaintiff has been fully apprised of the risks of recovery at a trial in this matter and agrees that this settlement is a fair monetary sum in light of those risks.
12. Z.D. has no outstanding bills or liens for any therapy he has received following the incident.
13. Counsel requests a fee in the amount of 25% of the gross settlement amounting to [REDACTED] after the reduction of litigation costs in this matter, which has been litigated.
14. Counsel requests payment of [REDACTED] for litigation costs, including filing fees, service fees, administrative office costs in accordance with the cost breakdown attached at Exhibit B.

15. Counsel has not and will not receive collateral payments or counsel fees for representation involving the same client from third parties, (i.e. subrogation claims).
16. The net payable to the minor, Z.Y, after attorney's fees and reimbursement of litigation costs is \$ [REDACTED]

WHEREFORE, Plaintiff Shanae Bridgeford respectfully requests that this Court permit Plaintiff to enter into a settlement recited above and that the Court enter an Order of Distribution as follows:

To: [REDACTED], a Minor :

DOB: [REDACTED]

Social Security: [REDACTED]

To: **The Law Office of Jared S. Zafran, LLC:**

Funds reimbursed for litigation expenses [REDACTED]

Counsel Fees (25% of Settlement) after costs [REDACTED]

**TOTAL:** [REDACTED]

Respectfully submitted,



**Andrew J. Thomson**  
**Attorney for Plaintiff**  
Attorney I.D. No. 87844  
Law Office of Jared S. Zafran, LLC  
1500 Walnut Street, Suite 500  
Philadelphia, PA 19102  
[Ajthomson@zafranlaw.com](mailto:Ajthomson@zafranlaw.com)  
215-587-0038

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**ZD, a minor by her parent and natural  
Guardian, SHANAE BRIDGEFORD**

*Plaintiff*

**CHESTER COMMUNITY CHARTER  
SCHOOL**

*Defendants*

: **No. 2:22-cv-05082**  
:  
: **CIVIL ACTION**  
:  
: **Electronically filed**  
:

I, Andrew J. Thomson, Esquire, do hereby certify that on the date noted below, a true and correct copy of foregoing Plaintiff's Motion for Leave Compromise a Minor's Action and Allocate Proceeds was electronically filed and is available for viewing and downloading from the ECF system.

Respectfully submitted,



**Andrew J. Thomson**  
**Attorney for Plaintiff**  
Attorney I.D. No. 87844  
Law Office of Jared S. Zafran, LLC  
1500 Walnut Street, Suite 500  
Philadelphia, PA 19102  
[Ajthomson@zafranlaw.com](mailto:Ajthomson@zafranlaw.com)  
215-587-0038



# Exhibit “A”



Name: [REDACTED]DOB: [REDACTED]

Chart #: 251567

**Behavioral Description of My 2nd Challenge:**

(quote participant's exact words):

My Treatment Period Goal	Target Date	Strengths-Based Objectives (My Actions)	Treatment Interventions (My Therapist's Actions)
Maintain safety by following my safety plan as discussed and documented during my evaluation by my evaluator.	10/7/2023	1. I will recognize warning signs and triggers, and use my internal coping strategies, supports and emergency resources. I agree to contact supports and emergency resources if I feel unsafe.	1. My therapist will review my safety plan and contract once I am assigned and revise as needed.

Structured tools (listed above) were used to create/ modify this goal:

☒ Yes ☐ No ☐ N/A

(Note: strengths, barriers, and discharge criteria/goals should quote participant's exact words)

**My Strengths:****My Potential Barriers:****My Discharge Criteria/Goals:**

History of trauma

When participant has reached 80% of treatment goals, discharge can be discussed.

**School Attendance Plan:**For school-aged children, if treatment interferes with school attendance, describe the plan to address the situation (below) or check "N/A": ☐ N/A**Method, Modalities, Frequency, and Duration of treatment Interventions:**e.g., ☒ Individual Therapy # hour sessions # time(s) per week

<input checked="" type="checkbox"/> Individual Therapy	<u>1</u> hour sessions	<u>1</u> time(s) per week
<input type="checkbox"/> Group Therapy	<u>        </u> hour sessions	<u>        </u> time(s) per week
<input type="checkbox"/> Family Therapy	<u>        </u> hour sessions	<u>        </u> time(s) per week
<input type="checkbox"/> Other:	<u>        </u> hour sessions	<u>        </u> time(s) per week

I have been offered a copy of my wellness plan and I have accepted/declined a copy. (Circle one)

Participant's Initials         **PARTICIPANT'S STATEMENT: MY SIGNATURE BELOW INDICATES THAT I UNDERSTAND AND AGREE WITH THE CONTENTS OF THIS PLAN.**

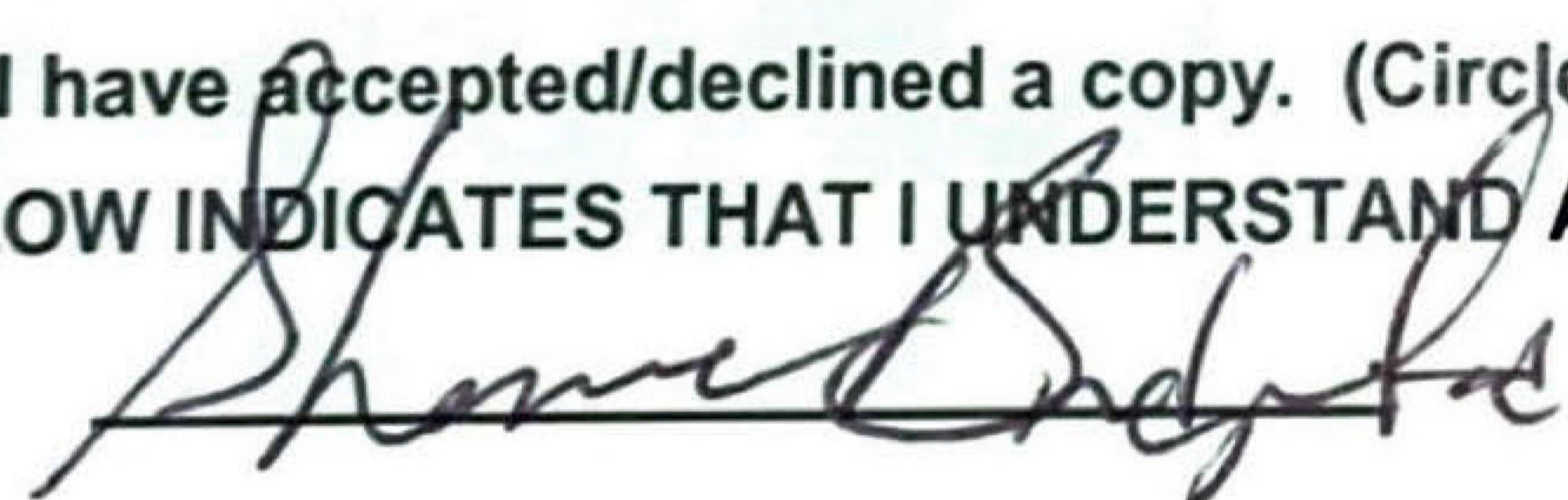
Participant, Parent, Legal Guardian:

Other:

Primary Treatment Provider (PTP):

Advanced Practice Prof. (APP)\*:

treatment provider (PTP), APP should sign on the PTP line.


Date: 4/10/23 Participant sig. required if  $\geq 14$ ; parent/legal guardian sig. required if participant is  $\leq 13$ Date:         Date: 4/10/2023Date:         

Check one:

MD/DO: ☒PA: ☐CRNP: ☐Initial: SB Review:

# Exhibit “B”

1:28 PM  
11/14/23  
Accrual Basis

The Law Offices of Jared S. Zafran LLC

## Transactions by Account

All Transactions

Type	Date	Num	Name	Memo	Amount	Balance
Advanced Client Costs						
		10.06.22(M)				
Bill	01/03/2023	2022012014	Court House Legal Services inc	2022012014 Zd V Chester Community Charter Sch		
Bill	01/15/2023	44691021888037209	M&T Bank	USDC Courts		
General Journal	11/10/2023			administrative fee		